

TRUDY A. NOWAK, P.C.

PMB #418

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Attorneys for Beth Lang, Chapter 7 Trustee

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF ARIZONA

In Re:)	Case No. 4:12-bk-16880-EWH
)	
Amado G. Calderon,)	Chapter 7
)	
Debtor(s).)	TRUSTEE'S DISCLOSURE OF
)	EXHIBITS AND WITNESSES
)	
)	Hearing Date: May 1, 2013
)	Time: 10:00 a.m.
)	Courtroom 446

Beth Lang, the duly appointed Chapter 7 Trustee herein, through undersigned counsel, hereby submits the following list of exhibits and witnesses pursuant to the Evidentiary Hearing Scheduling Order entered on January 4, 2013 (D.E. #28):

RESERVATIONS

These disclosures are based upon information reasonably available to the Trustee as of this date. Continuing investigation and discovery may alter these disclosures. Accordingly, the Trustee reserves the right to supplement the information disclosed below if additional information becomes available.

1 By making these disclosures, Trustee does not represent that any particular document
2 exists within his possession, custody or control. These disclosures are made without waiver of,
3 or prejudice to, any objections the Trustee may have.

4 The Trustee expressly reserves all objections, including, but not limited to, objections on
5 the grounds of: (a) relevance; (b) attorney-client privilege; (c) attorney work product doctrine; (d)
6 any other applicable privilege or protection under federal or applicable state law; (e) undue
7 burden; (f) immateriality; and (g) over breadth.

8 The Trustee reserves the right to clarify, amend, modify, or supplement the information
9 contained in these disclosures if and when the Trustee obtains supplemental information, to the
10 extent required by the Federal Rules of Civil Procedure.

11 The Trustee expressly reserves the right to identify and call as witnesses additional
12 persons other than those listed below, if, during the course of discovery and investigation relating
13 to this adversary proceeding, the Trustee learns that such additional persons have knowledge of
14 relevant matters.

15 These disclosures are made subject to and without limiting any of the foregoing
16 reservations. The Trustee makes these disclosures with the belief that an appropriate
17 confidentiality order and rational production limitations can and will be agreed upon at an
18 appropriate time, should they become necessary.

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20 **EXHIBIT LIST:**

- 21
22 1. Copy of Residential Lease Agreement between Debtor and Brian and Lisa
23 Torma signed April 9, 2012 for the real property located at 12611 N. Granville
24 Canyon Way, Oro Valley, Arizona 85755.

2. Copies of Debtor's Petition, Bankruptcy Schedules and Statements, and any amendments thereto.
3. Copies of Debtor's 2010 and 2011 federal and state tax returns.
4. Copies of Debtor's 2012 federal and state tax returns that have been requested by the Trustee.
5. Copy of Arizona Corporation Commission online corporate information page for 4 Closure Helper LLC.
6. Copy of Arizona Corporation Commission online corporate information page for Amado Calderon Professional Corporation.
7. Copy of the Pima County Assessor Record for the real property located at 7715 E. Entrada de Ventana, Tucson, Arizona 85750.
8. Copies of all pleadings, documents and other records on file with this Court.
9. Any documents listed in Debtor's list of exhibits.

WITNESS LIST:

1. Beth Lang, Chapter 7 Trustee, 1955 W. Grant Road, Suite 125, Tucson, AZ 85745.
2. Amado Calderon, Debtor, PO Box 70127, Tucson, AZ 85737.
3. Brian and Lisa Torma, Debtor's Tenants, 12611 N. Granville Canyon Way, Oro Valley, AZ 85755.
4. Sheri Lorensen, Debtor's former spouse, 7715 E. Entrada de Ventana, Tucson, AZ 85750.
5. All necessary foundation witnesses.

1 6. All witnesses revealed after the filing of this disclosure, whose identities are
2 presently unknown to the Trustee.

3 7. All witnesses called by the Debtor.

4 Dated: April 17, 2013

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6 TRUDY A. NOWAK, P.C.

7 /s/ Beth J. Shapiro

8 Trudy A. Nowak

9 Beth J. Shapiro

10 Attorneys for the Trustee
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